

Date of Hearing: August 24, 2016  
Time of Hearing: 10:30 a.m. (Eastern Time)  
Hearing Location: Albany, NY

UNITED STATES BANKRUPTCY COURT  
NORTHERNDISTRICT OF NEW YORK

In re:

TURKEY LAKE, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 15-12091 (Main Case)

Jointly Administered

**MEMORANDUM IN OPPOSITION TO TRUSTEE'S  
OBJECTIONS TO PROOF OF CLAIM NO. 40**

The undersigned creditor respectfully opposes Trustee's objections to certain proofs of claim, specifically Claim No. 40. The undersigned creditor filed its claim under Main Case No. 15-12091, the only case number ever provided to creditor. To penalize claimant for stating an alleged incorrect case number on cases that are being jointly administered is arbitrary, unreasonable and unfair to claimant. All documents and paperwork that claimant received from debtor's counsel, the trustee, or the court have shown Case No. 15-12091. Claimant has received no documents showing any other case number; therefore, claimant filed its claim under Case No. 15-12091.

<sup>1</sup> Debtors, along with the last four digits of each Debtor's tax identification number are: Turkey Lake, LLC (3488) ("Turkey Lake"); Premier Laser Spa of Albany, LLC (3453) ("Albany Laser Spa"); Cleveland Laser Spa, LLC (5481) ("Cleveland Laser Spa"); Columbus Laser Spa, LLC (3998) ("Columbus Laser Spa"); Lexington Laser Spa, LLC (6290) ("Lexington Laser Spa"); Nashville Laser Spa, LLC (5715) ("Nashville Laser Spa"); Premier Laser Spa of Baltimore, LLC (6976) ("Baltimore Laser Spa"); Premier Laser Spa of Boston, LLC (4240) ("Burlington Laser Spa"); Premier Laser Spa of Boston II, LLC (4998) ("Newton Laser Spa"); Premier Laser Spa of Cincinnati, LLC (7076) ("Cincinnati Laser Spa"); Premier Laser Spa of Greenville, LLC (1316) ("Greenville Laser Spa"); Premier Laser Spa of Indianapolis, LLC (4868) ("Indianapolis Laser Spa"); Knoxville Laser Spa, LLC (2122) ("Knoxville Laser Spa"); Premier Laser Spa of Louisville, LLC (6402) ("Louisville Laser Spa"); Premier Laser Spa of Pittsburgh, LLC (8087) ("Pittsburgh Laser Spa"); Premier Laser Spa of Virginia, LLC (4140) ("Virginia Beach Laser Spa"); Syracuse Laser Spa, LLC (6793) ("Syracuse Laser Spa"); Premier Laser Spa of Orlando, LLC (1.227) ("Orlando Laser Spa"); Premier Laser Spa of St. Louis, LLC (2047) ("St. Louis Laser Spa"); Premier Laser Spa of Kansas City, LLC (7938) ("Kansas City Laser Spa"); Premier Laser Spa of Richmond, LLC (4482) ("Richmond Laser Spa"); Premier Laser Spa of Columbia, LLC (3919) ("Columbia Laser Spa").

Claimant respectfully requests that its Claim No. 40 against Cleveland Laser Spa, LLC in the amount of \$3,800.00 be approved.



SCOTT MIHU, Secretary  
ACM MANAGEMENT CORP (CREDITOR)  
27230 Royalton Road  
Columbia Station, OH 44028  
Telephone: 440-236-6575  
Email: [smihu@jdstrucking.com](mailto:smihu@jdstrucking.com)

**CERTIFICATE OF SERVICE**

A copy of the foregoing Memorandum in Opposition was this 15<sup>th</sup> day of August, 2016, mailed to the following parties, via U.S. Regular Mail:

LeClair Ryan, A Professional Corporation,  
70 Linden Oaks, Suite 210, Rochester, NY 14625, Attn: Maureen T. Bass, Esq.

Office of the Unites States Trustee  
74 Chapel St., Suite 200, Albany, NY 12207, Attn: Kevin Purcell

Turkey Lake, LLC  
1163 Pittsford-Victor Road, Suite 150, Powder Mill Office Park, Pittsford, NY 14534, Attn: Michael Linehan.



SCOTT MIHU, Secretary  
ACM MANAGEMENT CORP (CREDITOR)

**BEVERLY A. ADAMCZYK CO., L.P.A.**

ATTORNEY AND COUNSELOR AT LAW

STANO LAW BUILDING  
6650 PEARL ROAD - SUITE 302  
PARMA HEIGHTS, OHIO 44130-3836  
TELEPHONE (440) 888-5400  
FACSIMILE (440) 888-5450

**RUSH**

August 15, 2016

James T. Foley, Clerk  
U.S. Courthouse  
445 Broadway, Suite 330  
Albany, NY 12207

Re: Turkey Lake, LLC, et al.,  
Chapter 11  
Case No.: 15-12091 (REL) (Main Case)

Please accept for filing the enclosed Memorandum in Opposition to Trustee's Objections to Proof of Claim No. 40 in the above matter, and return a date stamped copy to me in the envelope provided.

Thank you for your attention.

Sincerely,

BEVERLY A. ADAMCZYK CO., L.P.A.



Beverly A. Adamczyk

Enclosures

2016 AUG 15 AM 9:44  
CLERK OF COURT  
U.S. DISTRICT COURT  
N.D. OF NEW YORK  
ALBANY

2016 AUG 15 AM 9:44